

**UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
MICHIGAN
Southern Division**

Luis Gomez-Echeverria et al.,

Plaintiffs,

v.

Purpose Point Harvesting LLC et al.,

Defendants.

Case No. 1:22-cv-00314

Hon. Jane M. Beckering

PARTIES' STIPLULATION ON TRIAL EXHIBITS

Following meet and confer efforts between Plaintiffs and Defendant Purpose Point Harvesting LLC ("Purpose Point"), the Parties have agreed and stipulated to the following:

Exchange of Demonstratives and Witnesses

1. The parties stipulate and agree that any opening statement demonstratives will be shared with the opposing party by 5:00 p.m. the day before jury selection.
2. The parties stipulate and agree that all other demonstratives will be shared with the opposing party by 7:00 p.m. the day before their presentation in court.
3. The parties stipulate and agree that the names of witnesses will be shared with the opposing party by 7:00 p.m. the day before they testify.

Admission of Exhibits

Neither party objects to the admission of the following uncontested exhibits:

4. ETA 790 forms:
 - a. PTX 116
 - b. PTX 117

c. PTX 118

5. Paystubs:

a. PTX 18

b. PTX 19

c. PTX 20

d. PTX 38

e. PTX 56

f. PTX 57

g. PTX 58

h. PTX 69

i. PTX 80

j. PTX 81

6. Timesheets:

a. PTX 16

b. PTX 17

7. Department of Labor reports:

a. PTX 84

b. PTX 88

c. PTX 89

d. PTX 90

8. Bank records:

a. PTX 10

b. PTX 11

- c. PTX 12
- d. PTX 13
- e. PTX 14
- f. PTX 31
- g. PTX 50
- h. PTX 51
- i. PTX 52
- j. PTX 53
- k. PTX 73
- l. PTX 75
- m. PTX 76
- n. PTX 77
- o. PTX 107
- p. PTX 108

9. Grower invoices and contracts:

- a. PTX 121
- b. PTX 122
- c. PTX 123
- d. PTX 124
- e. PTX 125
- f. PTX 126
- g. PTX 127
- h. PTX 128

- i. PTX 129
- j. PTX 130
- k. PTX 131
- l. PTX 132
- m. PTX 133
- n. PTX 134
- o. PTX 135
- p. PTX 136
- q. PTX 137
- r. PTX 138
- s. PTX 139
- t. PTX 140
- u. PTX 141
- v. PTX 142
- w. PTX 143
- x. PTX 144
- y. PTX 145
- z. PTX 146
- aa. PTX 147
- bb. PTX 148
- cc. PTX 149
- dd. PTX 150
- ee. PTX 151

ff. PTX 152

gg. PTX 153

hh. PTX 154

ii. PTX 155

jj. PTX 156

kk. PTX 157

ll. PTX 158

mm. PTX 159

nn. PTX 160

oo. PTX 161

pp. PTX 162

10. H-2A visas and SSNs:

a. PTX 3

b. PTX 5

c. PTX 28

d. PTX 55

e. PTX 71

11. Hervil Gomez-Echeverria's injury:

a. PTX 32

b. PTX 33

c. PTX 34

d. PTX 35

e. PTX 36

f. PTX 37

IT IS SO STIPULATED.

Dated: May 25, 2025

BOIES SCHILLER FLEXNER LLP

By: /s/ Kenya K. Davis
Kenya K. Davis (D.C. Bar No: 502305)
Admitted to Practice in the Western District of
Michigan

MIGRANT LEGAL AID

/s/ Teresa Hendricks
Teresa Hendricks (P46500)

Attorneys for Plaintiffs

AVANTI LAW GROUP

By: /s/ Robert A. Alvarez
Robert A. Alvarez (P66954)

Attorney for Defendants